

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

IN RE THE COMPLAINT AND PETITION
OF COSTAR SAILING, LLC, AS OWNER,
AND J&J YACHT SERVICES, LLC, AS
OWNER PRO HAC VICE/OPERATOR, OF
THE S/V CARPE AURA, HULL #:
FPA542531819 AND OFFICIAL NO. 1291579,

CASE NO. 3:21-cv-0059

Petitioners,

v.

EDWARD AND CINDY MOREA

Claimants and Third-Party Plaintiffs,

v.

ATLANTIC CRUISING YACHTS, LLC,
FOUNTAIN PAJOT, SA, AND
CONSTANTINE BAKAS,

Third-Party Defendants.

MOREA CLAIMANTS' THIRD SUPPLEMENTAL FED. R. CIV. P (26(a)(1))
VOLUNTARY DISCLOSURES

Claimants, Edward and Cindy Morea, through undersigned counsel for their Third
Supplemental Initial Disclosures pursuant to Fed. R. Civ. P. 26 (a) (1) state: new

**(A)(ii) Description of documents relevant to the issues in dispute, list the
following additional medical records and bills:**

Receipts for Related

Appliances

Inglemoor Rehab Updated

Wayne Berberian, MD Updated

Morea04127-04138

Morea04139-04956

Morea04957-04974

In Re J&J Yacht Services, et al. Civil No. 3:21-CV-0059

Morea Claimants' Third Supplemental Fed. R. Civ. P 26(a)(1) Voluntary Disclosures
Page | 2

University Medical Center Dr.

Ahlawa

University Hospital updated.pdf

Medical Bills and summaries
submitted to UH

Darsit Shah, MD, ENT

Morea 04975-05949

Morea 05950- 06150

Morea06151- 06760

Morea06761-06770

The above listed documents can be downloaded via [Docs Produced with Claimants'](#)

[Third Supplemental Rule 26 Disclosure](#)

RESPECTFULLY SUBMITTED

Tabak Mellusi & Shisha LLP

DATED: October 20, 2023,

Admitted Pro Hac Vice:

BY: /s/ Jacob Shisha

Jacob Shisha, Esq.

Ralph J. Mellusi, Esq.

Tabak Mellusi & Shisha LLP

29 Broadway

New York, NY 10006

Tel (212) 962-1590

Fax(212) 385-0920

Email: Jshisha@sealawyers.com

Email: rjmellusi@sealawyers.com

LAW OFFICES OF K.G. CAMERON

Of Counsel Attorney for Claimants

DATED: October 20, 2023,

BY: /s/ K. Glenda Cameron

K. Glenda Cameron, Esq.

VI Bar No. 683

Physical: No. 29 A King Cross Street

Mailing: 2157 King Cross Street, No. 1

Christiansted, St. Croix

U.S. Virgin Islands 00820

Telephone: (340) 773-3444

Email: kglenda@cameronlawvi.com

In Re J&J Yacht Services, et al. Civil No. 3:21-CV-0059
Morea Claimants' Third Supplemental Fed. R. Civ. P 26(a)(1) Voluntary Disclosures
Page | 3

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel:

Andrew C. Simpson, Esq.
Andrew C. Simpson, P.C.
2191 Church St., Ste 5
Christiansted, VI 00820
Attorneys for Petitioners Costar Sailing, LLC, et al.

Email: asimpson@coralbrief.com

Ravinder S. Nagi, Esq.
V.I. Bar No. 1034
BOLTNAGI PC
Merchants Financial Center
4608 Tutu Park Mall, Suite 202
St. Thomas, VI 00802-1816
(340) 774-2944 Telephone
(340) 776-1639 Facsimile

Email: rnagi@vilaw.com

s/ Justin J. Shireman
Wilson Elser Moskowitz Edelman & Dicker LLP
260 Franklin Street - 14th Floor
Boston, MA 02110-3112
617.422.5307 (Direct)
617.422.5300 (Main)
617.423.6917 (Fax)
justin.shireman@wilsonelser.com

Attorneys for Third-Party Defendant Fountaine Pajot, SA

C. Jacob Gower, Esq. (R2103)
GOWER LEGAL LLC
1919 Pine Street
New Orleans, LA 70118
Attorney to Third-Party Defendant Dr. Constantine Bakas

Email: jacob@gowerlegal.com

LAW OFFICES OF DUENSING & CASNER

Matthew J. Duensing, Esq. - VI Bar No. 64
Joseph D. Sauerwein, Esq. - VI Bar No. R2030

Email: mduensing@vilawyers.com

Email: jsauerwein@vilawyers.com

In Re J&J Yacht Services, et al. Civil No. 3:21-CV-0059
Morea Claimants' Third Supplemental Fed. R. Civ. P 26(a)(1) Voluntary Disclosures
Page | 4

Robin P. Seila, Esq.- VI Bar No. R2043
9800 Buccaneer Mall, Bldg. 2, Suite 9
P.O. Box 6785
St. Thomas, U.S.V.I. 00804 Tel: (340) 774-6011
Fax: (340) 776-8520

Email: rseila@vilawyers.com

and

RUBIN, FIORELLA, FRIEDMAN & MERCANTE

James E. Mercante, Esq. Michael Stern, Esq.
630 Third Ave, 3rd Floor
New York, NY 10017
Tel.: (212) 953-2381

Email: jmercante@rubinfoarella.com

Attorneys for Third-Party Defendant Atlantic Cruising Yachts, LLC ("AYC")

[/s/ K. Glenda Cameron](#)